

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

LARRY GOOD & ASSOCIATES, INC.,  
D/B/A P.I. MIDWEST, A NEBRASKA  
CORPORATION,

Plaintiff,

vs.

WILLIAMS AND COMPANY  
CONSULTING, INC., AN IOWA  
CORPORATION

Defendant.

No. 8:06-cv-280

**DEFENDANT'S ANSWER TO  
PLAINTIFF'S COMPLAINT**

COMES NOW Defendant Williams & Company Consulting, Inc. and for its Answer  
to Plaintiffs Complaint states as follows:

1. Paragraph 1 is admitted.
2. Paragraph 2 is admitted.
3. Paragraph 3 is denied.
4. Paragraph 4 is admitted.
5. Paragraph 5 is denied for lack of sufficient information.
6. Paragraph 6 is denied for lack of sufficient information.
7. Paragraph 7 is admitted.
8. In response to Paragraph 8, it is admitted that Williams and Company was  
provided with the Predictive Index System. The remaining allegations are denied.

9. Paragraph 9 is denied.

10. In response to Paragraph 10, it is admitted that the attached correspondence was sent. The remaining allegations are denied.

#### FIRST CAUSE OF ACTION - BREACH OF CONTRACT

11. Defendant incorporates the Answers in Paragraphs 1 through 10 inclusive in response to paragraph 11.

12. Paragraph 12 is denied.

13. Paragraph 13 is denied.

14. Paragraph 14 is denied.

15. Paragraph 15 is denied.

#### SECOND CAUSE OF ACTION - CONVERSION

16. Defendant incorporates the Answers in Paragraphs 1 through 10 and paragraphs 11 through 15 inclusive in response to paragraph 16.

17. Paragraph 17 is denied.

18. Paragraph 18 is denied.

#### THIRD CAUSE OF ACTION - RICO

19 - 22. Defendant does not answer paragraphs 19 - 22 as Plaintiff's Count III has been dismissed by the Court. Thus, no answer is required.

FOURH CAUSE OF ACTION - FOR AN ACCOUNTING

23. Defendant incorporates the Answers in Paragraphs 1 through 10, paragraphs 11 through 15 inclusive and paragraphs 16 through 18 inclusive in response to paragraph 23.

24. Paragraph 24 is denied.

WHEREFORE DEFENDANT respectfully prays for an Order dismissing Plaintiff's Complaint and that costs be assessed against Plaintiff.

Respectfully submitted,



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ATTORNEYS FOR DEFENDANT  
WILLIAMS & COMPANY CONSULTING,  
INC.

Copy to:

David E. Pavel  
1190 Omaha Tower  
2120 So. 72nd Street  
Omaha, NE 68124

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record herein at their respective addresses disclosed on the pleading on January 29, 2007.

By: ☐ U.S. Mail ☐ facsimile  
☐ Hand delivered ☐ Overnight courier  
☐ Other ☒ ECF

Signature S/ Timothy A. Clausen